



**DEPARTMENT OF ENVIRONMENT AND CONSERVATION
TENNESSEE DIVISION OF AIR POLLUTION CONTROL
ANNUAL INSPECTION**

Reference No.: 01-0234
State Class: CM
Pollutant(s): PM, VOC & HAP

Environmental Specialist: MLC
Route To: VNM

Date Inspected: May 7, 2010

Company: Shawmut Advanced Material Solutions
Location address: 325 J.D. Yarnell Industrial Parkway
City/State/Zip: Clinton, Tennessee
Mailing Address, if different:

Company Contact/Title: Kevin Souza
Phone: (508) 588-3300 xt 344

Does Company impact an additional control area? YES/NO: No
If Yes, pollutant type:

Does Company have: NSPS (Part 60)? No **PSD?** No
 NESHAPS (Part 61)? No **MACT (Part 63)?** No

If YES, give subpart for NSPS, NESHAPS, MACT
Sources If YES to any, indicate point number(s):

Date of the last annual inspection: June 10, 2009
Time period covered by this inspection, from: January 2009 to December 2009
Is inspection partial or comprehensive? Partial – Report Review in the office

Total time required for this inspection (hours): 4.0
Was company in compliance during entire inspection time period? Yes
If NO, explain in final paragraph

If CM source: **Date annual report received in EFO:** February 19, 2010
Date annual report review complete/acknowledged by EFO: May 7, 2010
Did annual report have deviations from permit conditions (Y/N)? No

EXECUTIVE SUMMARY:

On May 7, 2010, Martie Carpenter reviewed the 2009 annual report submitted by Shawmut Advanced Material Solutions in Clinton, Tennessee. Shawmut manufactures textile material for the automotive and boating industry. The facility is permitted for three laminators. The laminators apply flexible polyurethane foam to fabric, film or vinyl.

The facility is classified as a Conditional Major Source. The facility was issued a Conditional Major Permit on February 15, 2008 that expires on February 1, 2018. The facility is permitted for three natural gas-fired flame laminators.

The first comprehensive inspection was conducted last year on June 10, 2009. The facility was found out of compliance because the facility did not notify the Division of the change of the responsible official. A partial inspection was conducted during the 2009-2010 annual inspection year.

Conditional Major Permit #461613P

Date Issued: February 15, 2008

Date Expires: February 1, 2018

Textile Production

Natural gas-fired flame laminators

A pinhole dye tester with each laminator

Condition 1: Justin Keppy is not the responsible official to represent and bind the facility in environmental permitting affairs. Mr. Keppy ceased being the responsible official in late 2008. On June 18, 2009, the facility notified the Division that Mr. Kevin Souza was the responsible official.

Condition 2: Is an informational condition with no compliance method.

Condition 3: Is an informational condition with no compliance method.

Condition 4: Is an informational condition with no compliance method.

Condition 6: VOCs emitted from this facility shall not exceed 24 tons during all intervals of 12 consecutive months. The records were reviewed from January 2009 to December 2009. The highest twelve-month interval occurred in August 2009 with 0.5129 tons of VOC being emitted.

Condition 7: Emissions of any HAP shall not exceed 15.30 pounds per hour of HCL on a monthly average basis and 9.0 tons during all intervals of 12 consecutive months. Emissions of any combination of HAPs shall not exceed 24 tons during all intervals of 12 months. The highest monthly average for HCL occurred in September 2009 with 0.0925 tons being emitted. The highest twelve-month for HCL occurred in March 2009 with 0.9386 tons being emitted. HCL is the only HAP emitted at the facility.

Condition 8: The Division has not required the facility to show proof of compliance with the emissions for Particulate matter, Volatile content and Hydrochloric Acid by EPA Method 5, 24 and 26, respectively.

Condition 11: The facility must calculate the actual quantities of VOC and HAPs emitted from this facility during each calendar month.

Log1 – monthly emissions from the laminators

Log2- VOCs and HAPs from other operations at the facility

Log3- 12 consecutive month summary

The facility maintains the required records. The records were reviewed from January 2009 to December 2009. The records were included in the March 31st annual report.

Condition 12: Is an informational condition with no compliance method.

Condition 13: The facility is required to submit an annual report to the Knoxville Field Office by March 31, 2009. The report must state the compliance status of the facility with Conditions 6 and 7 of the permit. The report must include the records required by Conditions 11 of the permit. The 2009 annual report was submitted to the Knoxville Office on February 19, 2010.

Condition 14: The permit does not expire until February 1, 2018.

01- Natural gas-fired flame laminator used for textile production

Condition 16: Particulate matter emitted from this source shall not exceed 5.27 pounds per hour based on a monthly average. The records were reviewed from January 2009 to December 2009. The highest monthly average for Particulate matter emissions occurred in March 2009 with 1.51 pounds/hour being emitted.

Condition 17: Hydrochloric acid emissions shall not exceed 5.10 pounds per hour based on a monthly average. The records were reviewed from January 2009 to December 2009. The highest monthly average for Hydrochloric acid emissions occurred in March 2009 with 1.81 pounds/hour being emitted.

02- Natural-gas fired flame laminator used for textile production

Condition 20: Particulate matter emitted from this source shall not exceed 5.27 pounds per hour based on a monthly average. The records were reviewed from January 2009 to December 2009. The highest monthly average for Particulate matter emissions occurred in May 2009 with 1.06 pounds/hour being emitted.

Condition 21: Hydrochloric acid emissions shall not exceed 5.10 pounds per hour based on a monthly average. The records were reviewed from January 2009 to December 2009. The highest monthly average for Hydrochloric acid emissions occurred in May 2009 with 1.29 pounds/hour being emitted.

03- Natural-gas fired flame laminator used for textile production

Condition 24: Particulate matter emitted from this source shall not exceed 5.27 pounds per hour based on a monthly average. The records were reviewed from January 2009 to December 2009. The highest monthly average for Particulate matter emissions occurred in November 2009 with 0.74 pounds/hour being emitted.

Condition 25: Hydrochloric acid emissions shall not exceed 5.10 pounds per hour based on a monthly average. The records were reviewed from January 2009 to December 2009. The highest monthly average for Hydrochloric acid emissions occurred in November 2009 with 0.89 pounds/hour being emitted.

Based upon the review of the March 31st annual report, Shawmut Corporation was found in compliance in that no compliance problems were found with any issue under the purview of this inspector.

Maile L. Capintre
Inspector's Name

VEE Certification Number: 1488
Certification Expiration Date: 09/24/10

I verify that the format and content of this report conforms to established TN Division of Air Pollution Control annual inspection standard operational procedures guidance and that the compliance determination made in this report is correct.

V.N. Malichio
Supervisor/Manager

5/7/10
Date